

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**[PROPOSED] ORDER GRANTING DEFENDANT'S  
MOTION TO RETAIN DOCUMENTS UNDER SEAL**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, upon consideration of Defendant Google LLC's Motion to Retain Documents Under Seal, Memorandum of Law in Support, supporting Declarations, and any opposition and reply thereto, IT IS HEREBY ORDERED that:

1. Google's request to retain under seal portions of Reply in Further Support of its Motion for Summary Judgment and Opposition to Plaintiff's Partial Motion for Summary Judgment (ECF 184), is GRANTED;
2. Google's request to retain under seal portions of Its Reply to its Rule 56.1 Statement In Support of Google's Motion for Summary Judgment (ECF 185), is GRANTED;
3. Google's request to retain under seal portions of Its Response to Plaintiff's Affirmative Rule 56.1 Statement In Support of Plaintiff's Cross-Motion for Summary Judgment (ECF 186), is GRANTED;
4. Google's request to retain under seal portions of Supplemental Declaration of Sara

B. Tomezsko in Further Support of Google's Motion for Summary Judgment and Opposition to Plaintiff's Cross-Motion for Summary Judgment (ECF 187), is GRANTED;

5. Google's request to retain under seal portions of the deposition transcript of Stuart Vardaman, filed in redacted form as Exhibit 3 to the Supplemental Declaration of Sara B. Tomezsko (ECF 187-3), is GRANTED;

6. Google's request to retain under seal portions of email chain dated May 11, 2018 through June 1, 2018 between Melissa Lawrence, Will Grannis, Brian Stevens, Rachel Quirk, and Diane Greene, filed in redacted form as Exhibit 4 to the Supplemental Declaration of Sara B. Tomezsko (ECF 187-4), is GRANTED;

7. Google's request to retain under seal portions of the hiring packet for applicant, filed in redacted form as Exhibit 5 to the Supplemental Declaration of Sara B. Tomezsko (ECF 187-5), is GRANTED;

8. Google's request to retain under seal portions of email chain dated December 13, 2017 through December 20, 2017 between Brian Stevens and Diane Greene, filed in redacted form as Exhibit 6 to the Supplemental Declaration of Sara B. Tomezsko (ECF 187-6), is GRANTED;

9. Google's request to retain under seal portions of Tariq Shaukat's Executive Recruiting Weekly Meeting document, filed in redacted form as Exhibit 7 to the Supplemental Declaration of Sara B. Tomezsko (ECF 187-7), is GRANTED;

10. Google's request to retain under seal portions of Google's Objections and Supplemental Responses to Plaintiff's Second Set of Interrogatories served in this litigation on November 4, 2020, filed in redacted form as Exhibit 10 to the Supplemental Declaration of Sara

B. Tomezsko (ECF 187-10), is GRANTED;

11. Google's request to retain under seal portions of the Final Comparator Performance Data Spreadsheet sorted to show Scott Penberthy data, filed in redacted form as Exhibit 14 to the Supplemental Declaration of Sara B. Tomezsko (ECF 187-14), is GRANTED;

IT IS SO ORDERED

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Honorable Lorna G. Schofield  
United States District Judge